Case 2:10-cv-02080-KJD-PAL Document 3 Filed 12/02/10 Page 1 of 3

1 2 3 4 5 6 7 8	MICHAEL F. BOHN, ESQ. Nevada Bar No.: 1641 mbohn@bohnlawfirm.com LAW OFFICES OF MICHAEL F. BOHN, ESQ., LTD. 1880 E. Warm Springs Rd., Ste. 110 Las Vegas, Nevada 89119 (702) 642-3113/ (702) 642-9766 FAX Attorney for defendant Nevada Title UNITED STATES DISTRICT COURT DISTRICT OF NEVADA	
10	DIMITRITZA TOROMANOVA and DAVID WYNN	CASE NO.: 2:10-cv-02080 KJD-PAL
11	Plaintiff,	CASE IVO 2.10 CV 02000 KJD I AE
12	vs.	
13	SOMA FINANCIAL; WELLS FARGO, N.A.,	
14	MORTGAGE ELECTRONIC REGISTRATIÓN SYSTEMS INCORPORATED; NEVADA TITLE; NATIONAL DEFAULT SERVICING	
15	CORPORATIONN	DEFENDANT NEVADA TITLE'S MOTION TO DISMISS
16 17	Defendants.	
18		
19	COMES NOW, defendant Nevada Title, by and through it's attorney, Michael F. Bohn, Esq. and	
20	moves this Court to dismiss the plaintiffs complaint. This motion is based upon the points and authorities	
21		
22		
23		
24	LAW OFFICES OF MICHAEL F. BOHN, ESQ., LTD.	
25		
26	By: <u>/s/</u> Michael F. Bohn, Esq.	
27	Nevada Bar No. 1641	
28	1880 E. Warm Springs Road, Ste. 110 Las Vegas, Nevada 89119 Attorneys for defendant Nevada Title	
	Autoriteys for defendant nevada Title	
	1	

POINTS AND AUTHORITIES 1 2 Rule 8 of the Federal Rules of Civil Procedure require only a short plain statement of the claim 3 showing that the pleader is entitled to relief. 4 The plaintiffs complaint is not short or plain. It is several pages of incoherent gibberish, 5 regarding some sort of code and vessel court, and appears to have been plagiarized from some 6 information on the internet. It does not comply with the Rules of Civil Procedure or the Local Rules of 7 this Court, and should be dismissed. 8 **CONCLUSION** 9 The plaintiffs complaint fails to allege any specific claims regarding Nevada Title Company. The 10 complaint alleges claims against "defendants" collectively without any specific detail of which party 11 committed each act. The complaint should be dismissed for failure to state a claim. 12 DATED this 2nd day of December, 2010 13 LAW OFFICES OF 14 MICHAEL F. BOHN, ESQ., LTD. 15 16 By: 17 Michael F. Bohn, Esq. Nevada Bar No. 1641 18 1880 E. Warm Springs Road, Ste. 110 Las Vegas, Nevada 89119 19 Attorneys for defendant Nevada Title 20 21 22 23 24 25 26 27 28

CERTIFICATE OF MAILING I HEREBY CERTIFY that on the <u>2nd</u> day of December 2010, I served a photocopy of the foregoing **MOTION TO DISMISS** by placing the same in a sealed envelope with first-class postage fully prepaid thereon and deposited in the United States mails addressed as follows: Dimitritza Toromanova David Wynn Miller P.O. Box 19153 Las Vegas, NV 89132 An Employee of the LAW OFFICES OF BOHN & MORRIS